

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 1:12CV0883
	)	
Plaintiff,	)	
	)	JUDGE DONALD C. NUGENT
v.	)	
	)	
\$620,280.00 IN U.S. CURRENCY,	)	<b><u>ANSWER</u></b>
	)	
Defendant.	)	
	)	

Now comes Defendant, by and through counsel, and for its Answer to the United State of America's Complaint in Forfeiture states as follows:

**JURISDICTION AND INTRODUCTION**

1. Defendant admits the allegations contained in Paragraph 1 of the Complaint.
2. Defendant admits the allegations contained in Paragraph 2 of the Complaint.
3. Defendant admits the allegations contained in Paragraph 3 of the Complaint.
4. Defendant admits the allegations contained in Paragraph 4 of the Complaint.
5. Defendant denies the allegations contained in Paragraph 5 of the Complaint.

**FORFEITURE COUNT**

6. Defendant admits Cleveland police officers stopped the black Hummer that Eric D. Jones was driving on November 24, 2011 but denies the remaining allegations contained in Paragraph 6 of the Complaint.
7. Defendant denies the allegations contained in Count 7 of the Complaint.

8. Defendant denies the allegations contained in Count 8 of the Complaint.
9. Defendant denies the allegations contained in Count 9 of the Complaint.
10. Defendant denies the allegations contained in Count 10 of the Complaint.
11. Defendant admits the allegations contained in Count 11 of the Complaint.
12. Defendant denies the allegations contained in Count 12 of the Complaint.

AFFIRMATIVE DEFENSES

13. The Cleveland police officers lacked probable cause to stop Mr. Jones' vehicle.
14. The Cleveland police officers lacked probable cause to search Mr. Jones' vehicle.
15. The Cleveland police officers lacked probable cause to arrest Mr. Jones.

Respectfully submitted,

/s/Roger M. Synenberg  
ROGER M. SYNENBERG (0032517)  
DOMINIC J. COLETTA (0078082)  
Synenberg & Associates, LLC  
55 Public Square, Suite 1200  
Cleveland, Ohio 44113  
(216) 622-2727  
(216) 622-2707 FAX  
lawoffice@synenberg.com

**CERTIFICATE OF SERVICE**

I hereby certify that on May 1, 2012, a copy of the foregoing *Answer* was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's system.

/s/Roger M. Synenberg  
ROGER M. SYNENBERG